

**PHILLIPS, SPALLAS & ANGSTADT LLP**  
**Todd A. Angstadt – (SBN 166404)**  
**Jessica Stuart Pliner – (SBN 261976)**  
 505 Sansome Street, Sixth Floor  
 San Francisco, California 94111  
 Telephone: (415) 278-9400  
 Facsimile: (415) 278-9411  
 tangstadt@psalaw.net  
 jpliner@psalaw.net

Attorneys for Defendant  
 SPOT LIGHTING SUPPLIES, INC, dba  
 Lighting-spot.com

**John V. Picone III**, Bar No. 187226  
 jpicone@hopkinscarley.com  
**Jennifer S. Coleman**, Bar No. 213210  
 jcoleman@hopkinscarley.com  
**Aleksandr Korzh**, Bar No. 286613  
 akorzh@hopkinscarley.com  
**HOPKINS & CARLEY**  
 A Law Corporation  
 P.O. BOX 1469  
 SAN JOSE, CA 95109-1469  
 Telephone: (408) 286-9800  
 Facsimile: (408) 998-4790

Attorneys for Plaintiff  
 PHOTOGRAPHIC ILLUSTRATORS  
 CORPORATION

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA

PHOTOGRAPHIC ILLUSTRATORS CORPORATION,  Plaintiff,  v.  SPOT LIGHTING SUPPLIES, INC. dba Lighting-spot.com Defendant.	) Case No. 3:14-cv-2010-VC ) ) ) <b>STIPULATION TO EXTEND</b> ) <b>DEADLINES FOR CERTAIN</b> ) <b>DISCOVERY DEADLINES and</b> ) <b><del>PROPOSED</del> ORDER</b> ) ) ) <b>Hon. Vince Chhabria</b> ) ) )
--	---

Pursuant to Civil Local Rule 6-2, Plaintiff PHOTOGRAPHIC ILLUSTRATORS CORPORATION and Defendant SPOT LIGHTING SUPPLIES, INC. hereby stipulate as follows:

1. The parties have agreed to an extension for SPOT LIGHTING SUPPLIES, INC.'s responses to written discovery requests from PHOTOGRAPHIC ILLUSTRATORS CORPORATION to February

1 10, 2015;

2 2. PHOTOGRAPHIC ILLUSTRATORS CORPORATION's 30(b)(6)

3 depositions of SPOT LIGHTING SUPPLIES, INC. to occur on or

4 before February 16, 2015 but no earlier than February 11, 2015;

5 3. The Deadline to move to compel further responses to discovery:

6 February 23, 2015;

7 4. The deadline for Expert disclosures: March 13, 2015; and

8 5. The Expert discovery cut-off: May 15, 2015.

9 The parties are engaging in settlement discussions at this time and desire to attempt to  
10 resolve this matter prior to completing the above-referenced discovery. Counsel for Defendant  
11 was in trial from January 5<sup>th</sup> through January 13<sup>th</sup> in the San Jose branch of this Court on another  
12 case, (5:08-cv-05296-PSG), which was only set for trial in October 2014. At the pretrial  
13 conference in the San Jose case on December 16, 2014, the Court also ordered additional fact  
14 and expert discovery to take place prior to December 31, 2014, even though discovery had  
15 previously closed in 2011 in that matter. Defense counsel's trial, pretrial deadlines, ordered  
16 discovery and trial preparation for the January 5, 2015 trial impacted the parties' ability to have  
17 meaningful settlement discussions and complete discovery in this matter, following the  
18 December 11, 2014 Early Neutral Evaluation and prior to the previously set deadlines.

19 There have been no prior modifications of any of the deadlines set by this Court in this  
20 matter.

21 Trial in this matter is set for November 9, 2015, with a Pretrial conference on October  
22 27, 2015. The deadline for Motion hearings is August 20, 2015. These deadlines are not  
23 affected by the requested scheduling change.

24 As PHOTOGRAPHIC ILLUSTRATORS CORPORATION does not so stipulate,  
25 Defendant SPOT LIGHTING SUPPLIES, INC. reserves its right to move the Court for leave to  
26 complete its 30(b) deposition of PHOTOGRAPHIC ILLUSTRATORS CORPORATION,  
27 should the matter not resolve in February as a result of the parties' settlement negotiations.

1 IT IS SO STIPULATED:

2  
3 DATED: January 21, 2015

**PHILLIPS, SPALLAS & ANGSTADT LLP**

4  
5 By: s/ Jessica Stuart Pliner  
6 Todd A. Angstadt, Esq.  
7 Jessica Stuart Pliner, Esq.  
8 Attorneys for Defendant  
SPOT LIGHTING SUPPLIES, INC.

9 DATED: January 21, 2015

**HOPKINS & CARLEY, A LAW CORPORATION**

10  
11 By: s/ Aleksandr Korzh  
12 John V. Picone , III, Esq.  
13 Jennifer S. Coleman, Esq.  
14 Aleksandr Korzh, Esq.  
15 Attorneys for Plaintiff  
16 PHOTOGRAPHIC ILLUSTRATORS  
CORPORATION

17 I, Jessica Stuart Pliner, am the ECF user whose ID and password are being used to file this  
18 STIPULATION AND [PROPOSED] ORDER. In compliance with Civil Local Rule 5-1(i)(3), I  
19 hereby attest that the counsel whose e-signatures appear on the foregoing pages have concurred  
20 with this filing.

/s/ Jessica Stuart Pliner  
Jessica Stuart Pliner

21  
22 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

23 **DATED:** January 23, 2015

24   
25 **HONORABLE Vince Chhabria**  
26 **United States District Judge**